

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CODY ALLEN JONES,

Defendant.

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Case No. 12-CR-054-CVE

**DEFENDANT’S UNOPPOSED MOTION FOR
EXTENSION OF MOTIONS DEADLINES**

Counsel for Defendant Cody Allen Jones moves the Court to extend the time to file pretrial motions by ten days, from May 29, 2012, to June 8, 2012. Additionally, counsel requests the court extend the deadline for filing of responsive pleadings accordingly. In support of this Motion, Counsel submits the following for the Court’s consideration:

1. In compliance with Local Criminal Rule 47.4, Counsel advises the Court that she has spoken with Jan Reincke, Assistant United States Attorney, and the Government has no objection to the requested extension of the pretrial motions and response deadlines.

2. On May 21, 2012, Counsel for the defendant returned to work from an extended family medical leave and entered her appearance in this matter.

3. Upon request for discovery, Counsel for the defendant was informed that it should be delivered on the afternoon May 24, 2012.

4. The current motions deadline does not afford Counsel sufficient time to review discovery with and consult with her client, and determine what, if any, pretrial motions should be filed.

5. The defendant's request will not unduly delay or prejudice the administration of justice, as it does not impact the jury trial setting. Therefore, the Speedy Trial Act is not implicated.

WHEREFORE, Counsel for the defendant requests the Court extend the time in which to file pretrial motions by ten days and extend the deadline for filing of responses thereto accordingly.

Respectfully submitted,

OFFICE OF THE FEDERAL PUBLIC DEFENDER
Julia L. O'Connell, Federal Public Defender

By: s/Amanda M. Folsom
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CERTIFICATE OF SERVICE

I certify that on the 24th day of May, 2012, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant(s):

Jan Reincke
Assistant United States Attorney
Office of the United States Attorney
110 West 7th Street, Suite 300
Tulsa, Oklahoma 74119

s/Amanda M. Folsom
Amanda M. Folsom